

## **REMARKS**

Claims 22-42 remain pending and under examination. Support for the amendments to claims 22 and 36 may be found in the specification at, for example, page 59, lines 14-23.

Applicants respectfully traverse the rejection of claims 22-42 under 35 U.S.C. § 103(a) as being unpatentable over non-patent literature document “Traffic Dimensioning for Multimedia Wireless Networks” (“*Leila*”).

### **Regarding the “Response to Arguments” Section:**

In the Amendment filed on June 3, 2010, Applicants expressly explained the significance of the claimed second simulation configuration. *See* 6/3/2010 Amendment, pages 5-6. However, the Examiner did not respond to these arguments in the Final Office Action and continued alleging that the second simulation configurations “are doing the same processes [as the first simulation configuration];” that the second simulation configuration “is [not] for any particular purposes distinct from the first simulation configuration;” and that “it would be a matter of design choice to set configuration between the first simulation and the second simulation.” Final Office Action, page 3. Applicants respectfully disagree.

As discussed in the 6/3/2010 Amendment, Applicants have disclosed specifically the advantages of simulating a second configuration of mobile telephone network. For example, Fig. 6 shows a first event-based micro-simulation 201 and a second event-based micro-simulation 202. On page 59 of the specification, Applicants disclose that

a first module, associated with the first traffic scenario, processes jointly the first statistical results 209 made available after the event of collecting the statistical results for the first event-based micro-simulation 201 and the second statistical results 212 made available after the event of collecting the statistical results for the second event-based micro-simulation 202, to obtain performance indicators for the first traffic scenario. (Emphases added.)

Similar disclosure may also be found on pages 59-60, with respect to a second traffic scenario. In addition, Applicants disclose that “the method of evaluation according to the invention makes it possible to simulate the radio resource management procedures and/or algorithms with adequate accuracy and reliability, while minimizing the time required for the simulation.” Specification, page 60 (emphasis added). Therefore, “simulating a second configuration ... being statistically independent [to the first configuration]” is not only a matter of design choice and cannot be rendered obvious by *Leila*.

Notwithstanding the incorrect allegation regarding the “second simulation configuration,” Applicants nevertheless amended claims 22 and 36, as presented herein, to more clearly distinguish the pending claims from *Leila*. In the next section, Applicants will discuss the 35 U.S.C. § 103(a) rejection in light of the amended claims.

**Rejection of Claims 22-42 under 35 U.S.C. § 103(a):**

Applicants again request reconsideration and withdrawal of the rejection of claims 22-42 under 35 U.S.C. § 103(a) as being unpatentable over *Leila*. Specifically, *Leila* does not teach or suggest the following elements recited in claim 22 (and similarly in claim 36):

... simulating a second configuration of said mobile telephone network,  
said first and second configurations of said mobile telephone network being statistically independent of each other,  
...  
processing jointly statistical results generated using each of said simulation configurations.

(Emphases added, claim 36 containing similar recitations.)

The Final Office Action admitted that *Leila* does not teach the above-quoted features (prior to the amendment). See Final Office Action, page 3. However, the Final Office Action alleged that “Applicant has not disclose[d] the second simulation configuration is for any

particular purposes distinct from the first simulation configuration; [t]herefore, it would be a matter of design choice to set [a] configuration between the first simulation and the second simulation.” *Id.*

Applicants respectfully disagree and point out that the second simulation is not merely a matter of design choice but a necessary and required step at least because claim 22 recites an additional step requiring “statistical results generated using each of said simulation configurations” (emphasis added). Therefore, using the second simulation configuration, which is statistically independent of the first simulation configuration, the second simulation step may generate unexpected statistical results to be “process[ed] jointly” with the statistical results generated from the first simulation step using the first simulation configuration.

Thus, *Leila* fails to teach or suggest at least the above-quoted recitations of Applicants’ independent claims 22 and 36. Independent claims 22 and 36 are nonobvious and should therefore be allowable over *Leila*. In addition, dependent claims 23-35 and 37-42 should also be allowable at least by virtue of their respective dependence from base claim 22 or 36, and because they recite additional features not taught or suggested by *Leila*. Accordingly, Applicants respectfully request withdrawal of the rejection.

**Conclusion:**

Applicants request reconsideration of the application and withdrawal of the rejection. Pending claims 22-42 are in condition for allowance, and Applicants request a favorable action.

The Final Office Action contains a number of statements reflecting characterizations of the cited art and related claims. Regardless of whether any such statements are identified herein, Applicants decline to automatically subscribe to any such statements or characterizations in the Final Office Action.

If there are any remaining issues or misunderstandings, Applicants request the Examiner telephone the undersigned representative to discuss them.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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By: 

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